



MINISTRY  
OF THE INTERIOR

# Government Action Plan against Human Trafficking 2016–2017

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## Government Action Plan against Human Trafficking 2016–2017

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## Human trafficking and the situation regarding Finland

Human trafficking, and its attendant abuse, is considered one of the greatest human rights challenges of today. It is a serious crime involving violations of human dignity and integrity, and involves the exploitation and control of another human being. In most cases of human trafficking, victims are subjugated for the purpose of commercial exploitation. Such subjugation is gradual and prevents the victims from exercising their free will. Human trafficking has also been described as modern-day slavery.

A number of international obligations, which are considered in more detail below, involve action against human trafficking and deal with the punishment applicable to it. Trafficking and aggravated trafficking in human beings are punishable in Finland as offences against personal liberty under Chapter 25, sections 3 and 3a of the Criminal Code. Pursuant to the Criminal Code, an offender found guilty of human trafficking must be sentenced to imprisonment for at least four months and at most six years, while the aggravated form of the offence carries a prison sentence of at least two and at most ten years.

Cases of human trafficking that have come to light in Finland have concerned acts such as sexual and labour exploitation. New forms of human trafficking offences are continuously emerging. The National Rapporteur on Trafficking in Human Beings believes that human trafficking cases involving forced marriage or the exploitation of individuals in criminal activities are becoming more common. Cases of work-related exploitation have been detected in areas such as the restaurant sector. Public agencies such as the occupational safety and health authorities are encountering potential victims in workplaces. While many victims of human trafficking have come from abroad, cases have also arisen in which the victims were Finnish citizens.

In recent years, of approximately 20 to 30 suspected cases of human trafficking offences reported to the police, approximately five have been considered aggravated each year. A single human trafficking statistic can involve more than one offender and, correspondingly, more than one victim. Trafficking in human beings has been characterised as ‘hidden crime’, since both perpetrator and victim usually attempt to remain hidden from the authorities. Some human trafficking offences therefore remain concealed from both the au-

thorities and other parties in contact with the victims, such as non-governmental organisations or other private actors.

The Joutseno Reception Centre coordinates activities, within the assistance system, which are tailored for victims of human trafficking in Finland. The assistance system had 89 clients by the end of 2015, with the number remaining between 84 and 90 during the same year. Some of these clients were referred to the assistance system in 2015, while others had been involved for a longer period. At the end of 2015, two clients were underage. Clients of the assistance system for victims of human trafficking represent 26 nationalities.

In 2015, a total of 52 new clients were referred to the assistance system, all of whom were of adult age. The number of women was almost double that of men. Most clients referred to the system had become victims of work-related exploitation. In seven cases referred to the system in 2015, the person had been involuntarily employed as a domestic help. In most such cases, the person had been forced to work as a domestic worker abroad, but individual cases also occurred within Finland. In 2015, victims of human trafficking involving forced marriage and forced criminal activity were also referred to the assistance system.

New clients during 2015 represented 19 nationalities; even in this client group, the largest groups were Nigerians and Finns. Nigerian victims of human trafficking tend to have been subjected to sexual exploitation in another Member State of the European Union.

Of the 29 persons referred to the assistance system in 2015, 20 had become victims in Finland and 20 had fallen victim to human trafficking as work-related exploitation. Seven of these had fallen victim to sexual exploitation. Two of the individuals who had fallen victim in Finland were classified in the category 'other' with respect to the type of victimisation. This classification refers to forms of human trafficking not directly related to sexual or work-related exploitation.

In its status report for 2015, the assistance system estimated that the large-scale entry of asylum seekers to Finland had an indirect impact on the lower number of referrals. The large-scale migration that began in summer 2015 burdened the staff of reception centres, the Finnish Immigration Service, police and the Border Guard in particular. This initially lowered the number of referrals to the assistance system, but the figures have clearly begun to rise since the beginning of 2016. From 1 January to 31 August 2016, a total of 96 new referrals were received by the system. Most referrals to the assistance system during that period involved persons residing in Finland as asylum seekers. Almost without exception, they had fallen victim to human trafficking before their arrival in Finland, for example when travelling to Europe from their home countries.



The changes in the applicant profile have also been taken into account in various ways in the work of the Government anti-trafficking structure, for example by engaging in closer cooperation with the bodies responsible for receiving asylum seekers. For instance, members of the Secretariat Coordinating Government Action against Human Trafficking have visited reception centres and emergency accommodation units for asylum seekers. The situation concerning asylum seekers has also appeared on the agenda at meetings of various international bodies — in which members of the Government anti-trafficking structure participate — regarding human trafficking.

The assistance system for victims of human trafficking cooperates with the Reception Unit at the Finnish Immigration Service in organising training on human trafficking in reception centres. The assistance system also actively participates in the training of other authorities and organisations. As awareness of human trafficking increases and people become more adept at identifying potential victims, the number of asylum seekers referred to the assistance system is likely to increase.

The Finnish Civil Society Platform against Trafficking in Human Beings chose issues related to the potential human trafficking of asylum seekers as the theme of its April 2016 meeting. These issues have also been dealt with in regional meetings arranged by Victim Support Finland in spring 2016 in cities such as Turku and Oulu, in which invited participants included not only representatives of local organisations and authorities, but also the Government Anti-trafficking Coordinator and representatives of the assistance system for victims of human trafficking.

Where applicable, needs arising from the latest developments in human trafficking were taken into account in the planning and focus areas of the measures included in this Action Plan. For example, the measure listed second in this Plan — which involves enhancing the efficiency of work aimed at reaching out to the victims of human trafficking, and identifying and assisting them — plays a key role with respect to asylum seekers who are already in Finland.

## Steering of action against trafficking in human beings

Finland's first national Action Plan against Trafficking in Human Beings was adopted on 25 August 2005. The special steering group appointed to monitor its implementation submitted a proposal to revise the Plan on 5 December 2007. The Revised National Plan of Action against Trafficking in Human Beings was adopted by a Government resolution on 25 June 2008. The revised plan paid particular attention to identifying the victims of human trafficking. As a matter of policy, it declared that the Ministry of the Interior is responsible for coordinating action against human trafficking.

Legislation combating human trafficking was also comprehensively evaluated pursuant to the Revised National Plan of Action against Trafficking in Human Beings. Under the revised plan, the Government also appointed the Ombudsman for Minorities (currently Non-Discrimination Ombudsman) as the National Rapporteur on Trafficking in Human Beings from 1 January 2009. The Plan of Action resulted in both the partial reconstruction of criminalisations related to human trafficking and law drafting projects with respect to assisting the victims. The revised provisions in the Criminal Code on human trafficking entered into force on 1 January 2015, while the legal amendments concerning assistance for victims of human trafficking did so on 1 July 2015. Simultaneously, the title of the act in question was revised to become the Act on the Reception of Persons Applying for International Protection and Identifying and Assisting Victims of Trafficking in Human Beings. The title of the Act now directly specifies official duties in relation to the victims of trafficking in human beings.

According to the 14 December 2012 decision by the ministerial working group on internal security, on 20 March 2013 the Ministry of the Interior appointed a working group to draft a proposal for the organisation of the cross-sectoral monitoring and coordination of action against human trafficking by the Government. The working group submitted its proposal on 20 June 2013. As proposed by the working group, the Government Anti-Trafficking Coordinator began his activities in the Police Department of the Ministry of the Interior on 1 June 2014. The Coordinator's duties include arranging cross-administrative matters related to anti-human trafficking activities and participating in the related international cooperation.

The Government Anti-Trafficking Coordinator was also given the task of preparing a proposal on the future organisation of anti-trafficking coordination by the Government. The resulting draft was circulated for comments on 7 January 2015. The Coordinator continued with the preparations thereafter and the coordination structure began operating in autumn 2015.

## Coordination of action against trafficking in human beings

The coordination structure for action against trafficking in human beings includes the ministerial working group on internal security and the administration of justice and the meeting of permanent secretaries both of which oversee the related activities, the Secretariat Coordinating Government Action against Human Trafficking, the Government Anti-Trafficking Coordinator, and network cooperation led by the Anti-trafficking Coordinator, all of which were appointed for the term 19 August 2015 to 31 May 2017. The representatives of all key ministries engaged in anti-trafficking efforts are members of the Secretariat Coordinating Government Action against Human Trafficking. As necessary, the Secretariat consults experts such as the National Rapporteur on Trafficking in Human Beings.

Experts from bodies considered key in terms of anti-trafficking activities were invited to join the Government anti-trafficking network. The network has a broad-based membership including representatives of various authorities, such as the assistance system for victims of human trafficking and the National Police Board, as well as civil society (including labour market) organisations. A total of 27 actors are currently members of the network. The Anti-trafficking Coordinator participates regularly in the various activities of the Finnish Civil Society Platform against Trafficking in Human Beings, which is coordinated by Victim Support Finland.

## Reporting on human trafficking and international obligations

Finland's actions against trafficking in human beings are regularly evaluated by national and international actors. For each measure, this Action Plan specifies a set of related national and international recommendations concerning action taken against trafficking in human beings in Finland.

The Non-Discrimination Ombudsman, who is Finland's National Rapporteur on Trafficking in Human Beings, prepares a regularly submitted report on human trafficking issues. The first of these reports was issued for 2010, and the following ones for 2011 to 2014. The Non-Discrimination Ombudsman submits a report on human trafficking and the related phenomena to the Government each year, and to Parliament at four-year intervals.

There is also a raft of international obligations concerning action against trafficking in human beings. The first example of these is the Protocol to Prevent, Suppress and Punish Trafficking in Persons to the United Nations Convention against Transnational Organized Crime (Finnish Treaty Series 70-71/2006), adopted by Finland in 2006. The UNODC, the United Nations Office on Drugs and Crime, is a key expert body on action against human trafficking, which regularly disseminates information on human trafficking offences and the related measures taken — particularly those related to criminal liability — in the publication *Global Report on Trafficking in Persons*. The UNODC is also responsible for conferences and working groups involving parties to the above-mentioned Convention and its Protocol. Finland participates actively in these.

Secondly, there is the Council of Europe Convention on Action against Trafficking in Human Beings (Treaty Series 43–44/2012). The Council of Europe's Group of Experts on Action against Trafficking in Human Beings, GRETA, conducted its first evaluation round on Finland in 2013–2014 and published the related report on 4 June 2015. Recommendations on the implementation of the Convention were issued to Finland at the meeting of the Parties to the Convention on 15 June 2015 (document CP(2015)1). The four-year evalua-

tion rounds concerning the implementation of the Convention are consecutive in nature. The Council of Europe also engages in other types of active cooperation against human trafficking, including regular high level and expert joint meetings, and the development of anti-trafficking best practices and training materials.

With regard to international contractual obligations regarding human trafficking, the Convention Concerning Forced or Compulsory Labour (No. 29), adopted by the International Labour Organization ILO in 1930, should also be mentioned. The Convention, which aims at ending all forced labour, was ratified by Finland in 1935 (Treaty Series 44/1935). In all, 178 countries have ratified the Convention. ILO supplemented the Convention Concerning Forced or Compulsory Labour with a new Convention in 1957. ILO Convention No.105 seeks to prohibit the use of any form of forced or compulsory labour as a means of punishment and discrimination, and in promoting economic activity. Finland ratified this Convention in 1960 (Treaty Series 17/1960). ILO Convention No.182, concerning the prohibition and immediate action for the elimination of the worst forms of child labour, entered into force in 1999. Finland ratified this Convention in 2000 (Treaty Series 16/2000).

In June 2014, the International Labour Conference adopted a new Protocol and a Recommendation with respect to ILO Convention No. 29 on Forced Labour, which dates back to 1930. The Protocol aims to prevent human trafficking related to forced labour and to improve the position of victims. The Protocol deals with various topics, including the securing of legal remedies for victims and punishments for persons guilty of using forced labour in relation to human trafficking. The ratification process for the Protocol is pending in Finland. Within each Member State that ratifies it, the Protocol will enter into force 12 months from the date on which the ratification is registered.

Several human rights treaties binding on Finland, including the United Nations International Covenant on Economic, Social and Cultural Rights (Treaty Series 6/1976), the United Nations Convention on the Elimination of all Forms of Discrimination against Women (Treaty Series 67–68/1986) and the United Nations Convention on the Rights of the Child (Treaty Series 59–60/1991) impose obligations to take measures against human trafficking. Monitoring of the implementation of a number of human rights treaties involves reporting obligations, in which account must be taken of human trafficking issues where appropriate. For instance, the UNOCD collects statistical information on action taken against trafficking in human beings, including in Finland. Practices for coordinating the information submitted to the UNOCD are examined well in advance of the next reporting round, in collaboration with the competent ministries. In accordance with these international obligations, it is crucial that a human rights-based approach be adopted in all action taken to prevent human trafficking.

Finland participates in the European Union's action against trafficking in human beings, which is based on the Directive of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting the victims. The European Commission monitors the implementation of this Directive. Two anti-trafficking cooperation networks operate in connection with the European Commission, one for rapporteurs on human trafficking and the corresponding mechanisms, and the other for representatives of civil society. Both networks, in which Finland has active representation, organise meetings at regular intervals. The European Union is also a key source of funding for action — taken in Member States and by non-governmental organisations active within them — against trafficking in human beings. Funding targeted at, for example supporting the victims of human trafficking in Finland through the Internal Security Fund, one of the EU Home Affairs Funds, is referred to in measure 2. In addition, the European Commission has opened two EU-wide, individual funding application procedures for anti-trafficking action.

The Nordic Council of Ministers' active measures taken to combat human trafficking should be mentioned first with regard to regional anti-trafficking cooperation. The Council of Ministers runs a special anti-trafficking programme in which attention has been paid to issues such as combating human trafficking related to labour exploitation and the judicial processes regarding human trafficking offences. Various inter-Nordic, anti-trafficking projects are related to the programme. The Council of the Baltic Sea States is also highly active in combating human trafficking. Examples include projects involving training for the staff of foreign missions in member states of the Council of the Baltic Sea States, and action taken by the municipal sector to combat human trafficking.

It should also be noted that comprehensive information is available on action taken against human trafficking in various countries, for example in the Trafficking in Persons Report (the 'TIP Report'), published by the U.S. Department of State, which also includes an evaluation of the status of Finland's anti-trafficking actions.

## Action Plan against Human Trafficking

The above-mentioned reports and the opinions based on them, as well as measures included in previous planning documents, provide the basis for the development of national action against human trafficking. These have been reviewed by the Secretariat Coordinating Government Action against Human Trafficking. The Secretariat has also reviewed the situation picture concerning human trafficking from a variety of angles. Among the various examples of this, we could begin by citing the change in profiles associated with human trafficking offences and the related victims, including forced marriages and similar arrangements, and the fact that compulsion to participate in criminal activity is becoming more

common in western countries. With regard to the situation picture, the dynamics between human trafficking and the facilitation of illegal entry, and issues related to identifying victims of human trafficking who have arrived as asylum seekers, have also been reviewed.

In addition, discussions with various experts have highlighted the need to update the steering of action against trafficking in human beings, as observed in several reports on Finland and human trafficking, including the report by the National Rapporteur on Trafficking in Human Beings for 2014 and Council of Europe recommendation CP(2015)1. However, the same discussions have also emphasised the need to restrict any possible plan, in order to ensure the balanced targeting — in operational terms — of limited resources.

The measures required by this Government Action Plan will be implemented within the framework of the available financial resources. They will therefore not require funding in addition to known, new sources of funding, such as the appropriations of the Internal Security Fund reserved for action against trafficking in human beings. It should be mentioned that the active charting of new sources of funding is covered in decisions such as that made on 24 March 2015 by the Government plenary session on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014, according to which long-term funding will be secured for non-governmental organisations involved in providing assistance for victims of human trafficking.

As regards funding, it is also worth mentioning the support provided by the Finnish Slot Machine Association (RAY), in accordance with the applicable legislation on funding via non-profit organisations for the promotion of health and social wellbeing. On the basis of need, aid from RAY can be targeted at organisation-based assistance for victims of human trafficking provided via non-statutory services. The scope of such aid could cover activities undertaken prior to work for which the public sector is responsible, or support work provided subsequent to action taken by the public assistance system. RAY can also be actively involved in developing new and innovative forms of assistance and support. In 2016, RAY's aid for action against trafficking in human beings is targeted at activities such as the coordination of organisations' anti-trafficking work, and developing outreach working methods and identification of victims, and low-threshold assistance as part of the basic work undertaken by organisations.

For each measure included in this Action Plan, the related area of anti-trafficking action is specified. Four such areas are listed in most cases. These are the prevention of human trafficking, protection of victims, measures related to bringing offenders to justice, and collaboration with various actors. Internationally, these are usually referred to as the '4 Ps': prevention, protection, prosecution and partnership.

When specifying the time span of the Action Plan, account was taken of the fact that the term of the Secretariat Coordinating Government Action against Human Trafficking will end in 2017.

## Measures

### 1 Development of the coordination of anti-trafficking action and national cooperation

The structure of Government action against human trafficking is based on the working group proposal issued in 2013 on organising the cross-administrative monitoring and co-ordination of anti-trafficking action within the Government. On this basis, the Government Anti-trafficking Coordinator began his activities at the Ministry of the Interior in 2014. The term of this new, fixed-term position will end on 31 May 2017.

The Government coordination structure of action against human trafficking involves not only the ministerial working group on internal security and the administration of justice and the meeting of permanent secretaries, but also the Secretariat Coordinating Government Action against Human Trafficking and the Government anti-trafficking network. Similarly to the Government Anti-Trafficking Coordinator, the Secretariat was appointed for a fixed period until 31 May 2017.

Consideration of the further development and organisation of coordination tasks will be based on the experiences currently being collected on such activities. These experiences have been highly positive so far and encouraging feedback has been received from non-governmental organisations, for example. Many of the statements received on the draft version of this Action Plan suggested that the coordination structure and position of the Government Anti-Trafficking Coordinator should be made permanent. National anti-trafficking cooperation has improved, arrangements for data collection have been developed within the administration, and the funding of action against human trafficking has been augmented in many respects. The efficiency of international anti-trafficking co-operation has also improved, due to the active efforts of the coordination structure.

The Secretariat Coordinating Government Action against Human Trafficking will monitor this Action Plan in line with the Government's standard procedures, by listing the measures for which each actor is responsible. Progress made will be monitored on a regular

basis by the Secretariat, in consultation with the National Rapporteur on Trafficking in Human Beings, among other parties.

Well before the end of its term of office and in collaboration with actors within the coordination structure of Government action against human trafficking, the Government Anti-Trafficking Coordinator will prepare a proposal on the future of coordination activities. Possible legislative needs on anti-trafficking coordination will also be considered within this context.

- ▶ 1.1 Preparation of a proposal for the future of coordination, taking account of possible legislative needs in this respect.

Responsible ministry: Ministry of the Interior

Time frame: 2016–2017

Area of anti-trafficking activity: cooperation with various actors

Relates to:

- The Government plenary session decision of 24 March 2015 on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014: preparation of legislation on the activities of the Government Anti-Trafficking Coordinator.
- The recommendation included in the report by the National Rapporteur on Trafficking in Human Beings for 2014 on the preparation of legislation concerning the activities of Government Anti-Trafficking Coordinator (see the previous section).



## 2 Enhancing the efficiency of outreach work and improving the identification of and assistance for victims of human trafficking

### Documenting the national referral mechanism

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Development needs regarding action against human trafficking have been discussed within the Secretariat Coordinating Government Action against Human Trafficking and via networked cooperation, including with NGOs. In this context, in accordance with the existing international examples, documenting Finland's national referral mechanism — i.e. the system for identifying victims of human trafficking and referring them to services — has been considered a good starting point. Firstly, this facilitates the acquisition of information on prevailing practices for all of the cooperating parties, enabling the development of the procedures in question in the second stage.

The national referral mechanism as a concept and the related practices have been developed through international cooperation. One of the main participants in this is the Organization for Security and Co-operation in Europe, the OSCE, which has published a practical handbook on the mechanism.

In the first instance, Finland's national referral mechanism will be documented as concisely and descriptively as possible. Another aim is to assist the parties involved in the Government anti-trafficking network in forming an overall picture of the identification of victims of human trafficking and their referral to assistance. This is important to the future development of anti-trafficking work and will help to ensure that everyone working on the referral of victims of human trafficking operates according to uniform principles. The document concerning the referral mechanism — and the related process descriptions — will be supplemented, as necessary, on the basis of development efforts within, for example the assistance system for victims of human trafficking and organisations.

Work on the national referral system will be undertaken within the framework of the anti-trafficking network. This work will be organised under the leadership of the Government Anti-Trafficking Coordinator and its implementation will be monitored by the Secretariat Coordinating Government Action against Human Trafficking. Development of the referral mechanism will continue within the scope of funding for outreach work and the referral of victims of human trafficking. In this case, too, documenting the national referral mechanism will be coordinated through the coordination structure of Government action against human trafficking.

### **Development of outreach work concerning victims, victim identification and assistance**

In recent years, an average of 50 new victims of human trafficking have been referred to the national assistance system each year. In the experience of organisational actors engaged in outreach work, frightened victims of human trafficking, in particular, have not dared to seek assistance from the authorities. This hidden problem hampers the investigation and prevention of human trafficking offences. However, so far it has not been possible to collect precise information on the number of such victims and the extent of trafficking hidden in this manner, or on the actual effect such issues have on seeking assistance.

Improving the identification of victims of human trafficking will require actions such as the more accurate observation of the various aspects of the human trafficking phenomenon, and the further development of cooperation between organisations and the authorities. The particular strength of outreach work and assistance provided by the third sector lies in the establishment of contact with individuals in a vulnerable position and the provision of advisory and support services on a low threshold basis. This clearly encourages victims of human trafficking to seek help from the authorities too. Development efforts must also take account of changes in the human trafficking phenomenon.

Work in the third sector also focuses on enhancing trust — among known human trafficking victims — in the authorities responsible for assistance and criminal investigation; another emphasis is on making human trafficking offenders criminally liable for their actions. It is particularly important to reach people who lack residence permits. This is difficult within the framework of outreach work by third-sector organisations, let alone through action taken by the authorities.

It should be noted that churches and religious communities also engage in assistance activities close to people, where these are relevant to reaching the victims of human trafficking. If the individuals in question so wish, such communities can also offer spiritual assistance to traumatised individuals, which may be a crucial service for victims of human trafficking.

New methods, such as third-sector outreach work based on uniform indicators, may encourage frightened victims in particular to seek help from the assistance system for victims of human trafficking and to cooperate with the criminal investigation authorities. The purpose of such outreach work is to assist in the identification of victims of human trafficking, while streamlining such identification by the authorities and simplifying work in the field prior to the referral of individuals to the assistance system. A further aim is to strengthen multi-sectoral cooperation on anti-trafficking measures.

It would also be important to model the inclusion of vulnerable people as part of the development of identification and support activities. This would provide victims of human trafficking with a better opportunity to be heard during the planning process. Cooperation between the parties leading development activities and other actors would be paramount in this regard.

The aim would be to create practices — used collaboratively by non-governmental organisations and the authorities — for identifying victims and referring them to assistance, as well as to build a model for the use of indicators which assist in the identification of victims during field work. Secondly, third-sector actors must be trained to identify victims more effectively.

Action taken by the public authorities to assist victims of human trafficking must be developed continuously on the basis of multi-professional expertise. For instance, planning of the above-mentioned, indicator-based outreach work must also take account of the experiences accumulated by the authorities. A noteworthy example of the highly successful implementation of such an approach lies in the list of indicators long used by the police in field work. This list has been appended to police guidelines for the criminal investigation of human trafficking offences and identification of victims.

Cooperation with the municipal sector is also important. In this context and in collaboration with key expert bodies, the Association of Finnish Local and Regional Authorities has prepared guidelines on municipal services for victims of human trafficking. These guidelines and the related development efforts should help to ensure that we are better able to provide services of a uniform standard for human trafficking victims residing permanently in various municipalities, whether such victims are Finnish or they have a residence permit. Development efforts must take account of the gender and child perspective, including the relationships of victims with their children. The best interests of the child must be a priority in all measures involving children. This is a key issue both in outreach work and in identifying and providing assistance for victims. Expertise on child-related issues must be brought to bear on this work. Actors participating in development activities must promote procedures that prioritise the best interests of child victims and take the related, special issues into account when training their personnel.

It is also essential to develop training for professionals in the healthcare and social welfare sectors to identify human trafficking victims and refer them to assistance. This is also relevant to stepping up training on measures against human trafficking and to the sixth measure, on enhancing awareness, of this Action Plan.

When developing the measures taken by the authorities, problem areas in terms of children's rights and their realisation must be considered. These problem areas include situations in which children become vulnerable to human trafficking. In addition, it is also important to seek means to provide more effective protection for the children of human trafficking victims. Based on the above, concrete recommendations for action could be formulated on how to take account of the best interests of the child, while paying attention to the unique circumstances in each case. Even in this respect, it would be important to share effectively with other parties the knowledge gained via development activities.

Cooperation with non-governmental organisations, as described above, will play a key role in the upcoming work. Developing cooperation with municipalities and other regional actors will be of particular importance. This will include cooperation with the child welfare authorities. Providing effective assistance will also depend on raising awareness of the phenomenon in various communications channels. Outreach work must pay special attention to finding and identifying victims at the earliest possible stage within the asylum process. Attention must also be paid to the victim's situation after assistance measures have ended.

Potential victims of human trafficking among underage asylum seekers, particularly children who are not in the custody of a parent or guardian, must be identified as quickly as possible. In the case of unaccompanied minors seeking asylum, the investigation of potential abuse of various kinds is a regular practice, which also helps to identify victims of human trafficking. Minors under 12 years of age who are seeking asylum while accompanied by a parent are not — as a rule — heard on the grounds for seeking asylum. This places the focus on the parents' account during the asylum interview and the observations made by reception centre staff.

Account must also be taken of work on improving the position of victims of crime, the results of which include the procedure — adopted on 1 March 2016 — for assessing a victim's specific need for protection. This is based on legal provisions such as the Directive of the European Parliament and of the Council establishing minimum standards on the rights, support and protection of victims of crime (2012/29/EU). The Directive includes provisions on the recognition of vulnerable victims with a specific need for protection and their rights to such protection during the criminal investigation and trial. With regard to the above, the development of outreach work and identifying and assisting victims of human trafficking must take account of the preparations under way within a Ministry of Justice working group established with the purpose of promoting the victim's right of access to information in accordance with Directive 2012/29/EU.

The development measures (referred to in this document) based on special funding will result in easier identification of and assistance for victims of human trafficking, more effective support for victims and stronger cooperation structures in anti-trafficking work, including with regard to the public authorities. More effective identification of victims and assistance provided for them will also improve crime prevention and help to bring offenders to justice. Such development will also help to strengthen the various anti-trafficking collaboration forums and may even result in new contact channels between various actors. Practices should be developed through dialogue, while taking into account development proposals related to current practices and solving practical problems.

To develop outreach work and further enhance the identification of and assistance for victims, all available methods will be used to support key strategic projects by public authorities and organisations within the Government anti-trafficking network and implemented based on funding from the Internal Security Fund or other possible external sources. In addition, on the basis of such projects, the development of the national referral mechanism will be enabled through coordination arrangements.

With regard to NGOs, a project known as 'Askelmerkkejä dialogiseen tunnistamiseen' (Markers for recognition in dialogue) was initiated by the NGO PRO-tukipiste in spring 2016. Members of the project's steering group include the Government Anti-Trafficking Coordinator, a representative of the National Rapporteur on Trafficking in Human Beings, and members representing the assistance system for victims of human trafficking and representing key non-governmental organisations. A similar project for developing the assistance provided for the victims of such acts should also be arranged by the public authorities.

### **Supported and safe housing for victims of human trafficking**

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Victims of human trafficking may need supported and safe housing services in various situations. It is therefore essential to inform municipalities and shelters of opportunities for victims of human trafficking who have fallen victim to sexual violence or domestic violence to seek help from shelters if necessary. Simultaneously, these actors are informed of the appropriate procedures concerning the safe housing of victims of human trafficking. The expertise of the assistance system for victims of human trafficking will be important for the successful preparation of the related communication.

Secondly, it is important to ensure that victims of human trafficking who have not been allocated a place in a municipality can be placed in supported and safe housing services if necessary. The Joutseno Reception Centre is responsible for the related arrangements.

- ▶ 2.1 Documenting the current Finnish national referral mechanism (NRM) for victims of human trafficking and updating the information provided in the NRM as development progresses.

Responsible ministries: Ministry of the Interior, Ministry of Justice, Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment

- ▶ 2.2 Developing outreach work with victims of human trafficking and improvement of the identification of and assistance for victims, based on development projects under the national programme of the Internal Security Fund.

Responsible ministries: Ministry of the Interior, Ministry of Justice, Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment.  
Other responsible parties: Actors responsible for development projects

- ▶ 2.3 Developing training for professionals in the healthcare and social welfare sectors to identify and assist victims of human trafficking

Responsible ministry: Ministry of Social Affairs and Health. Other responsible parties: International Organization for Migration IOM, the assistance system for victims of human trafficking

- ▶ 2.4 Municipalities and shelters are informed of the opportunities for victims of human trafficking who have fallen victim to sexual or domestic violence to seek help from the shelters if necessary, and the appropriate procedures concerning the safe housing of victims of human trafficking.

Responsible ministry: Ministry of Social Affairs and Health. Other responsible parties: National Institute for Health and Welfare THL, the assistance system for victims of human trafficking

- ▶ 2.5 Ensuring that victims of human trafficking who have not been allocated a place in a municipality can be placed in supported and safe housing services if necessary.

Responsible ministry: Ministry of the Interior. Other responsible parties: The assistance system for victims of human trafficking

Time frame: 2016–2017

Areas of anti-trafficking activity: protection of victims, cooperation with various actors and measures related to bringing offenders to justice.

Relates to:

– The Government plenary session decision of 24 March 2015 on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014: ensuring that victims of human trafficking are immediately referred to the assistance system as soon as the criminal investigation authorities have reasonable grounds to believe that a victim of this kind is in question.

– The recommendation in the report by the National Rapporteur on Trafficking in Human Beings for 2014 on improving collaboration between the assistance system and NGOs in such a way that more victims of human trafficking identified by NGOs are referred to the assistance system. The measure also relates to the report's recommendation that all authorities that may encounter victims of human trafficking, (including municipal healthcare and social welfare employees, child welfare employees, the police, the Border Guard and the occupational safety and health authorities) should be able to identify victims of human trafficking and refer them to the assistance system. The measure further concerns the report's recommendation that local government action against human trafficking (for instance in the healthcare and social welfare sectors and in child welfare services) be intensified to ensure that victims of human trafficking and their underage children (or the underage children accompanying them) receive the assistance they need, and that the provision of such assistance is actively monitored.

It is also related to the above-mentioned report's recommendation that close collaboration be developed between the criminal investigation authorities and the assistance system for victims of human trafficking. Such cooperation would help to ensure that victims of human trafficking are referred to the assistance system as soon as the criminal investigation authorities have (reasonable) grounds to believe that a victim of this kind is in question. The measure is also related to the report's recommendation that the assistance system for victims of human trafficking be further developed so that as many victims as possible are referred to the assistance system and receive the help they need, including suitable accommodation and sufficient support in relation to their mental health and everyday lives.

- Council of Europe recommendation CP(2015)1, according to which Finland should further improve the identification of victims of human trafficking, in particular by introducing a clear national referral mechanism, and by promoting the participation of several actors in the identification process. The measure also relates to the same document's recommendation that Finland ensure that the assistance provided to victims of human trafficking is adapted to their individual needs, and that special attention is paid to the child victims of human trafficking, including underage individuals who are not in the custody of a parent or guardian.

### 3 Monitoring of legislation related to assistance for victims of human trafficking

The provisions related to assistance for victims of human trafficking were amended in accordance with Government proposal 266/2014 vp to Parliament for acts amending the Act on the Reception of Persons Applying for International Protection and the Aliens Act. The purposes of these amendments included legally formalising the tasks of the assistance system for victims of human trafficking, to make the overall system more predictable and transparent and to create a clear division of responsibilities. This would help to protect victims, secure their human rights and guarantee equal treatment. The amendments that entered into force on 1 July 2015 also amended the title of the above-mentioned Act. The new title is the Act on the Reception of Persons Applying for International Protection and Identifying and Assisting Victims of Trafficking in Human Beings.

When submitting the above-mentioned legislative proposal on 27 November 2014, the Government issued a statement according to which the Ministry of the Interior will closely monitor the impacts of the proposal for the assistance and identification of victims of human trafficking, and gather statements from key parties by the end of 2016. According to the Government's statement, on the basis of the statements received legislative or other measures to remedy the situation must be undertaken, if necessary, should defects appear in the assistance and identification system. The Parliament's Employment and Equality Committee referred to the same issue in its statement (TyVL 16/2014 vp) submitted during the processing of the Government proposal 266/2014. The Committee considered it extremely important that the impacts of the proposed amendments and the functioning of the assistance system be monitored on a broad basis, in accordance with the Government's statement. This statement by the Employment and Equality Committee was appended to the committee report issued by the Administration Committee on the same matter, in accordance with which Parliament adopted the new provisions based on the Government proposal on 6 March 2015.

The Ministry of the Interior monitors the impacts of the amendments to the Act on the Reception of Persons Applying for International Protection and Identifying and Assisting



Victims of Trafficking in Human Beings that entered into force on 1 July 2015. In this respect, use can be made of the experiences gained in the projects pending on this matter. The Ministry of the Interior compiles statements from key parties. On the basis of the statements, and observations made during monitoring, the Ministry of the Interior will assess whether legislative or other measures are required to further develop assistance for victims of human trafficking.

- ▶ 3.1 Monitoring of the amendments to the Act on the Reception of Persons Applying for International Protection and Identifying and Assisting Victims of Trafficking in Human Beings, taking account of the experiences gained from development projects.

Responsible ministry: Ministry of the Interior

Time frame: 2016–2017

Area of anti-trafficking activity: protection of victims

Relates to:

– The recommendation in the report by the National Rapporteur on Trafficking in Human Beings for 2014 that monitoring be performed to establish whether the proposed legislative amendments concerning the identification of and assistance for victims of human trafficking constitute a sufficient response to the current problem of the non-referral of sexually exploited victims in Finland to the assistance system. According to the recommendation, where necessary the Government must undertake legislative and other measures to resolve this issue.

– Council of Europe recommendation CP(2015)1, according to which Finland should ensure that every potential victim of human trafficking is allocated a period for recovery and consideration of their position, during which they may be assisted by the protection and assistance measures referred to in the Convention.

## 4 Detection of human trafficking in official proceedings

Several authorities encounter phenomena related to human trafficking during the course of their duties. The detection of human trafficking offences could be promoted within various official proceedings. This text first considers occupational safety and health, before moving on to discuss procedures undertaken by Finnish missions with regard to entry and residence permits.

In several cases of human trafficking for the purpose of labour exploitation, the police have initiated criminal investigations on the basis of tip-offs or requests from occupational safety and health authorities. It is therefore vital that occupational safety and health authorities pay attention to the detection of human trafficking during employer monitoring. Occupational safety and health inspectors must have access to the appropriate instructions promoting the uncovering of human trafficking. During inspections, anti-trafficking material should also be available, where necessary, for distribution to the inspected actors. It is also important that inspectors are trained in how to use such material.

Similarly, coordination of monitoring of the use of foreign labour should focus attention on topical issues related to human trafficking. This could be promoted through the coordination group standardising the supervision of foreign employees. Furthermore, when developing legislation on the supervision of occupational safety and health, it should be ensured that occupational safety and health authorities have the right to access confidential information held by other authorities, to the extent necessary to detect trafficking in human beings.

When processing visa and residence permit issues, Finnish missions abroad must have up-to-date instructions on the prevention of illegal immigration. These should include illustrative material on trafficking in human beings. Such material could refer to the use of various case examples or checklists, for example.

- ▶ 4.1 Occupational safety and health authorities should attend to detecting human trafficking when supervising employers, in accordance with the instructions issued to occupational safety and health inspectors. These instructions include information on issues such as detecting human trafficking and referring victims to assistance services. Material guiding people to contact the assistance system for victims of human trafficking is available for distribution during inspections. Occupational safety and health inspectors are trained in using such material in their work.

Responsible ministry: Ministry of Social Affairs and Health. Other responsible parties: Occupational safety and health authorities

- ▶ 4.2 The coordination group standardising the supervision of foreign employees regularly highlights issues related to human trafficking; such issues are also highlighted during participation in various cooperation bodies on the use of foreign labour and the combating of the shadow economy.

Responsible ministry: Ministry of Social Affairs and Health

- ▶ 4.3 Enhance legislation on supervision by occupational safety and health authorities, by reviewing their right to access confidential information from other authorities, which is crucial to the detection of trafficking in human beings.

Responsible ministry: Ministry of Social Affairs and Health

- ▶ 4.4 Update material intended for Finnish missions abroad, on the prevention of illegal immigration related to human trafficking during the visa and residence permit processes.

Responsible ministry: Ministry for Foreign Affairs

Areas of anti-trafficking activity: measures related to bringing offenders to justice and co-operation with various actors

Relates to:

– The Government plenary session decision of 24 March 2015 on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014: ensuring that victims of human trafficking are referred to the assistance system as soon as the criminal investigation authorities have reasonable grounds to believe that a victim of this kind is in question; and ensuring that the Non-Discrimination Ombudsman has the right to attend human trafficking trials held behind closed doors, even in cases where the Ombudsman is not providing the victim with legal assistance.

– The recommendation in the report by the National Rapporteur on Trafficking in Human Beings for 2014 that the availability of specialist resources should be increased and secured, particularly within the criminal investigation authorities and the prosecution service.

– Council of Europe recommendation CP(2015)1, according to which Finland should enhance the efficiency of its investigation of human trafficking offences and the related prosecutions — with regard to all forms of exploitation — in order to ensure appropriate and preventive legal consequences, by strengthening the competencies and degree of specialisation of the police, public prosecutors and judges.

## 5 Measures taken by the criminal investigation authorities

Of the approximately 20 to 30 suspected cases of human trafficking offences reported to the police in recent years, between one and five a year have been classified as aggravated. Each offence may have involved one or more victims and one or more offenders. Human trafficking offences reported to the police are investigated by the local police. The National Bureau of Investigation employs experts specialising in human trafficking offences, while the National Police Board coordinates anti-trafficking work by the police force. In early 2012, the National Police Board issued instructions to the police on intervening in cases of human trafficking and similar offences, and providing assistance to the victims. The instructions in question were updated in early 2014 (2020/2013/5080). The instructions include guidelines on identifying human trafficking offences, criminal investigations and cooperation with various authorities. They also cover assistance for victims of human trafficking and the functioning of the assistance system, the process for granting a reconsideration period, and the impacts of suspected human trafficking on the asylum procedure and the implementation of decisions to remove a person from the country. The police must apply an extremely low threshold when referring victims to the assistance system. The instructions in question are also applied, as appropriate, by the Finnish Border Guard.

The police also participate in the multi-professional assistance team that is affiliated to the assistance system and is specifically tasked with assessing threats to the safety of victims of human trafficking.

In 2014, the National Police Board established a network of experts within the police for the prevention of human trafficking offences. The network includes a senior police officer and a person responsible for training his or her peers in migration affairs from each police unit. The aim of the network is to develop police units' special expertise on the prevention of human trafficking offences and the provision of assistance to victims.

In light of issues such as the development of new forms of human trafficking crimes, it is important that police guidelines on human trafficking are up-to-date at all times. In addition, national and local police training on human trafficking must be further devel-

oped. Such training must have a particular focus on the identification and investigation of human trafficking related to sexual exploitation. It is also worth mentioning that the development of cooperation with the police will be one of the priority areas of the project involving the authorities, as referred to in measure 2.

- 5.1 Ensuring that the guidelines of the police and the Border Guard are up to date, particularly with regard to detecting new forms of crime

Responsible ministry: Ministry of the Interior. Other responsible parties: National Police Board and the Finnish Border Guard

- 5.2 Enhance national and regional training as part of the basic and supplementary training of police officers, particularly in identifying and investigating human trafficking related to sexual exploitation

Responsible ministry: Ministry of the Interior. Other responsible parties: National Police Board and local police

Areas of anti-trafficking activity: Measures related to bringing offenders to justice and co-operation with various actors

Relates to:

– The Government plenary session decision of 24 March 2015 on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014: ensuring that victims of human trafficking are referred to the assistance system as soon as the criminal investigation authorities have reasonable grounds to believe that a victim of this kind is in question; and ensuring that the Non-Discrimination Ombudsman has the right to attend human trafficking trials held behind closed doors, even in cases where the Ombudsman is not providing the victim with legal assistance.

– The recommendation in the report by the National Rapporteur on Trafficking in Human Beings for 2014 on increasing and securing the availability of specialist resources, particularly within the criminal investigation authorities and the prosecution service.

– Council of Europe recommendation CP(2015)1, according to which Finland should enhance the effectiveness of human trafficking investigations and the related prosecution with regard to all forms of exploitation, in order to ensure appropriate and preventive legal consequences, by strengthening the competencies and degree of specialisation of the police, public prosecutors and judges.

## 6 Enhancing the effectiveness of training related to action against trafficking in human beings, and increasing awareness

Training is a key prerequisite for ensuring effective action against trafficking in human beings, preventing such trafficking and increasing awareness. The need for high-quality training on action against trafficking in human beings is also emphasised by the continuous transformation of all forms of human trafficking offences.

Key parties providing training in action against trafficking in human beings include the Ministry of the Interior, Ministry of Justice, the assistance system for victims of human trafficking, the Finnish Immigration Service, the Office of the Prosecutor General, the Police University College, the National Rapporteur on Trafficking in Human Beings and non-governmental organisations specialising in human trafficking issues. Finnish experts, including the Government Anti-Trafficking Coordinator and the National Rapporteur on Trafficking in Human Beings, also train international colleagues in seminars abroad.

The focus areas and target groups of such training must be adapted to meet the situation in question. In the near future, it will be essential — in cooperation with the Finnish Immigration Service, the assistance system for victims of human trafficking and other key expert parties — to enhance the efficiency of training on human trafficking provided for employees of reception centres. This could be done by selecting target groups such as social workers and public health nurses who are working on such cases.

When providing training for court personnel, account should be taken of securing an opportunity for the Non-Discrimination Ombudsman to attend human trafficking trials also when held behind closed doors, even in cases where the Ombudsman is not providing the victim with legal assistance. This aspect was already taken into account in activities such as the training provided for court personnel regarding the above-mentioned Directive of the European Parliament and of the Council, establishing minimum standards on the rights, support and protection of victims of crime.

Examples of the circumstances emphasising the need for training include the frequency with which occupational safety and health inspectors encounter, in situations indicative of human trafficking, falsified employment documentation, such as working hour records and employment contracts. Through internal training sessions, the occupational safety and health authorities have raised awareness of human trafficking issues among personnel working in the same administrative branch. Training on action against trafficking in human beings must be based on a human-rights and victim-oriented perspective and the building and strengthening of collaboration practices. Anti-trafficking training efforts must be promoted within the scope of all activities having a key role in action against trafficking in human beings. The targeting of training must be intensified.

Anti-trafficking networks should be deployed in the planning of key training sessions and in briefings on such sessions. Training development is supported by the know-how of anti-trafficking expert bodies. Various authorities ensure that the training sessions they organise pay attention to sector-specific characteristics. Where necessary, advanced training and individual training are provided for persons who are allocated human trafficking-related tasks beyond the scope of their normal duties.

As part of its official duties, the assistance system for victims of human trafficking not only provides training, but also maintains the [www.humantrafficking.fi](http://www.humantrafficking.fi) website. A victim of trafficking cannot be supported before the assistance system becomes aware of him or her. Not all victims are referred to assistance — awareness of human trafficking and the identification of and assistance for victims need to be further enhanced. Accordingly, the assistance system is seeking to help raise awareness of human trafficking and of the assistance available to victims. Through their actions, other actors, such as the National Rapporteur on Trafficking in Human Beings, are also helping to raise awareness of human trafficking.

Anti-trafficking communications should be targeted at both the general public and professional actors. Communications must be developed in collaboration with the anti-trafficking coordination structure, other experts and civil society, including labour market organisations. Such development must take account of experiences gained of awareness raising in other countries. Particular attention should be paid to young people when planning and targeting the communications described above. For this reason, interest groups representing the target persons must be included in the design of the materials at the earliest possible phase. International anti-trafficking actors, such as the IOM, have experience of participatory approaches of this kind. Cooperation may also involve various events, such as film festivals, which attract target groups. Diverse use should be made of various communications channels, including the social media.



Even officials employed by central and local government should be further activated, as should non-governmental organisations. Training sessions must be as practical as possible and they should be open to uniform quality evaluation. For example, employees of the assistance system for victims of human trafficking provide training and induction for various actors, including investigative bodies, healthcare and social welfare employees, students in various fields, and organisations. The authorities and organisational actors can be activated through activities such as joint seminars and meetings where positive examples of anti-trafficking practices can be shared and the networking of anti-trafficking actors can be encouraged. This work is supported by an information and advice helpline organised by the assistance system for victims of human trafficking; the helpline has been particularly popular with the authorities.

Finnish experts should also share their expertise through regional and international anti-trafficking cooperation with international colleagues, while correspondingly seeking knowledge of the latest developments in international anti-trafficking procedures.

The funding of activities aimed at enhancing training and awareness should include support available through the national programme of the Internal Security Fund and other possible external funding sources.

- ▶ 6.1 Improve the coordination, quality and targeting of training on action against trafficking in human beings.
- ▶ 6.2 Increase awareness of human trafficking by targeting groups such as young people, while involving representatives of the target group in the preparation of communication methods and content.
- ▶ 6.3 Support the work of the authorities through training, a 24/7 helpline and networking events.
- ▶ 6.4 Enhance the training of reception centre staff on human trafficking targeting especially social workers and public health nurses working in centres.

Responsible ministries: Ministry of the Interior, Ministry of Justice, Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment. Other responsible parties: Administration subordinate to the ministries, such as 6.3: assistance system for victims of human trafficking (a 24/7 helpline); 6.4: the Finnish Immigration Service, the assistance system for victims of human trafficking

Time frame: 2016–2017

Areas of anti-trafficking activity: prevention of human trafficking, protection of victims, measures related to bringing offenders to justice and collaboration with various actors.

Relates to:

- The Government plenary session decision of 24 March 2015 on Parliament's position regarding the report by the National Rapporteur on Trafficking in Human Beings for 2014: ensuring that victims of human trafficking are referred to the assistance system as soon as the criminal investigation authorities have reasonable grounds to believe that a victim of this type is in question; and ensuring that the Non-Discrimination Ombudsman has the right to attend human trafficking trials held behind closed doors, even in cases where the Ombudsman is not providing the victim with legal assistance.
- The recommendation in the report by the National Rapporteur on Trafficking in Human Beings for 2014 that the availability of specialist resources should be secured and increased, particularly within the criminal investigation authorities and the prosecution service. The measure also relates to the recommendation in the report on securing the National Rapporteur on Trafficking in Human Beings' right of access to information: the National Rapporteur on Trafficking in Human Beings should have the right to attend human trafficking trials held behind closed doors.
- Council of Europe recommendation CP(2015)1, according to which Finland should enhance the effectiveness of human trafficking investigations and the related prosecution with regard to all forms of exploitation, in order to ensure appropriate and preventive legal consequences, by strengthening the competencies and degree of specialisation of the police, public prosecutors and judges.

## 7 Development of international anti-trafficking cooperation

Finland actively participates and contributes to the definition of international recommendations and practices.

Finland engages in active international cooperation related to action against trafficking in human beings. In this respect, action against trafficking in human beings is defined by a multitude of obligations governed by international law, such as the Protocol to Prevent, Suppress and Punish Trafficking in Persons to the United Nations Convention against Transnational Organized Crime, and the Council of Europe Convention on Action against Trafficking in Human Beings.

Finland also actively participates in the European Union's actions against trafficking in human beings. This is based on provisions such as the Directive of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting its victims (2011/36/EU).

The regional and global cooperation related to human trafficking including with countries of origin and transit is highly active. Action taken against trafficking in human beings by the Council of the Baltic Sea States and the Nordic Council's projects supporting action against the phenomenon of human trafficking are examples of this. Close cooperation with national anti-trafficking actors in Nigeria is a prime example of cooperation with countries of origin. Bilateral cooperation must be targeted, taking account of changes in human trafficking offences.

Measures that directly or indirectly prevent human trafficking are often included in social responsibility actions taken by private companies. Due to the internationalisation of the economy, this provides excellent opportunities for international cooperation. During visits to various countries, leading anti-trafficking experts have familiarised themselves with corporate campaigns promoting social responsibility which have involved various forms of anti-trafficking activities.

Finland supports the Nordic project against human trafficking for the purposes of labour exploitation, which was launched by the Nordic Council of Ministers. The related project group is led by Denmark. Project aims include planning tailor-made training modules for business sectors selected on the basis of a risk assessment, in order to promote the detection of human trafficking. On the basis of the above-mentioned materials, the project also intends to organise interactive meetings with representatives of business life and labour market organisations. The Children's Rights and Business Principles, drawn up by the United Nations' Global Compact initiative and the international Save the Children organisation (Pelastakaa lapset ry in Finland), should also be mentioned with regard to corporate social responsibility, since they take comprehensive account of anti-trafficking activities.

Active actors and a network of highly accessible partners is a prerequisite for international cooperation. In this respect, key contacts include the foreign affairs administration, its missions abroad and the Government Anti-Trafficking Coordinator alongside their extensive international cooperation networks, and the National Rapporteur on Trafficking in Human Beings with its European and global reporting networks. The Ministry of the Interior's responsibility for coordinating the assistance system for victims of human trafficking with the Council of the Baltic Sea States' anti-trafficking projects is also noteworthy. Regional action forms part of international anti-trafficking cooperation. Examples of this include the Northern Finland Regional State Administrative Agency's cooperation with the regions of North-Western Russia.

Coordination and negotiations concerning international anti-trafficking activities should promote the rights of women and girls in particular. The entry with regard to girls' rights also relates to measure eight, which concerns taking account of the circumstances, best interests and rights of children during anti-trafficking activities. In line with the human rights strategy of the foreign affairs administration, particular attention is paid in foreign policy to implementing the rights of the most vulnerable groups, including victims of human trafficking.

A prerequisite for enhancing the efficiency of international cooperation is the active participation of actors involved in practical anti-trafficking work in international projects, as well as diligent application for the related funding. Information on international funding sources must be brought promptly, and in an understandable form, to the attention of networks engaged in anti-trafficking action, whether they involve the public authorities or other organisations.

- ▶ 7.1 Key expert bodies have a strong influence on international anti-trafficking recommendations and practices.
- ▶ 7.2 In international coordination and negotiations within the framework of bodies such as the EU, the UN and the Council of Europe, Finland promotes the rights of women and girls in anti-trafficking activities in particular. In line with the human rights strategy of the foreign affairs administration, particular attention is paid in foreign policy to implementing the rights of the most vulnerable groups, including victims of human trafficking.
- ▶ 7.3 Actors involved in practical anti-trafficking work are encouraged to participate in international projects.

Responsible ministries: Ministry of the Interior, Ministry of Justice, Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment

Time frame: 2016–2017

Area of anti-trafficking activity: cooperation with various actors

Relates to:

- The recommendation in the National Rapporteur on Trafficking in Human Beings' report for 2014, that the action plan should embrace both the gender and child perspective.
- The memorandum of the Council of Europe's anti-trafficking body GRETA, appended to the Council of Europe's recommendation CP(2015)1, which, among other recommendations, urges the authorities to further develop international cooperation on the prevention of human trafficking, to provide assistance to victims of human trafficking and to prosecute offenders, for instance by exploring new opportunities to cooperate with government and other actors in countries of origin.

## 8 Development of research

State-of-the-art research is conducted in Finland on trafficking in human beings. In this respect, a particular mention should be given to high-quality research projects — conducted by the European Institute for Crime Prevention and Control (HEUNI) — whose findings can be applied to practical anti-trafficking measures. In addition to research projects, HEUNI is running various international development projects related to the detection and prevention of human trafficking. Active research on action against trafficking in human beings has also been conducted at all tiers of the education system. Such research has received crucial support from the expertise of the National Rapporteur on Trafficking in Human Beings.

The research activities of the European Migration Network (EMN), which operates in Finland as part of the Finnish Immigration Service, have also been of key assistance in the collection of information on trafficking. For example, the EMN can, if necessary, supply comparative data on the Member States of the European Union and Norway with regard to measures taken under this Action Plan. Information is supplied through the EMN in the form of an evaluation of short and longer term activities, through ad hoc surveys and research reports.

It is vital that resources be secured for anti-trafficking research in the future. It would also be important to continue cooperation with international actors engaged in anti-trafficking research. Key actors of this kind in the Nordic countries include the Norwegian research foundation FAFO and the Danish Centre against Human Trafficking. The work of the European Migration Network is supported by the provision of high-quality information and assistance in accumulating expertise on human trafficking.

- 8.1 Secure research resources on human trafficking for HEUNI and the European Migration Network.

Responsible ministries: Ministry of Justice and Ministry of the Interior

Time frame: 2016–2017

Areas of anti-trafficking activity: prevention of human trafficking, protection of victims, measures related to bringing offenders to justice and collaboration with various actors.

Relates to:

– The memorandum of the Council of Europe’s anti-trafficking body GRETA, appended to the Council of Europe’s recommendation CP(2015)1, which, among other recommendations, requests that the Finnish authorities continue conducting and supporting research on human trafficking. According to the memorandum, research serves as a key information source and provides a basis for further action when examining the impacts of current operating principles. Subject areas, according to the memorandum, include human trafficking inside states and new forms of human trafficking, such as human trafficking for the purpose of forcing people to beg and to engage in crime.

## 9 Taking account of children's circumstances, best interests and rights during anti-trafficking activities

Child victims of human trafficking and the children of adult victims are in a particularly vulnerable position. All anti-trafficking activities must take account of the circumstances of children, their best interests and their rights. The best interests of children must be the primary concern during all activities involving children.

The United Nations Convention on the Rights of the Child obliges Finland and other parties to the Convention to protect children from all types of sexual exploitation and abuse. According to the Convention, the contracting states must take all measures required to prevent the abduction of, sale of or trafficking in children for any purpose or in any form.

The Convention is supplemented by the Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography, which entered into force in Finland in 2012. A child who has fallen victim to exploitation or abuse must receive assistance. This helps to promote the child's recovery and social reintegration. Preventive measures with regard to human trafficking, including child welfare services and crime prevention, must take account of the fact that children are particularly vulnerable to human trafficking. Collaboration between the police and child welfare authorities is a prime example of a key activity in this respect.

The Government anti-trafficking network includes various key authorities and organisations involved in taking practical steps to secure the position of children, and a representative of the Ombudsman for Children. To secure collaboration against child trafficking, it is crucial that the Ombudsman for Children and other expert bodies continue to liaise closely when planning anti-trafficking activities.

Government anti-trafficking coordination promotes the prevention of child trafficking, the recognition, assistance and protection of child victims, the apprehension of child traffickers, and the investigation and prosecution of the related crimes. In this respect, it should also be mentioned that the second measure in this Action Plan — enhancing the effec-



tiveness of outreach work among victims of human trafficking and improving the identification of and assistance for such victims — emphasises measures for prioritising the best interests of the child when developing anti-trafficking activities.

The authorities and non-governmental organisations work in close collaboration in the prevention of child trafficking and enhancing awareness of the problem. NGOs should be encouraged to apply for funding for anti-child-trafficking activities from both Finnish and international sources of funding. NGOs engaged in action against child trafficking are kept closely connected to the anti-trafficking network.

- ▶ 9.1 The authorities work in close collaboration with non-governmental organisations in preventing child trafficking and enhancing anti-child-trafficking awareness.
- ▶ 9.2 Non-governmental organisations are facilitated to participate in internationally funded projects by measures such as the active distribution of information on such projects and, if necessary, the provision of expert assistance on issues of substance.
- ▶ 9.3 One of the focus areas in enhancing the effectiveness of outreach work with victims of human trafficking and improving the identification of and assistance for such victims (measure 2) will involve taking account of children's circumstances, best interests and rights.

Responsible ministries: Ministry of the Interior, Ministry of Justice, Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment

Time frame: 2016–2017

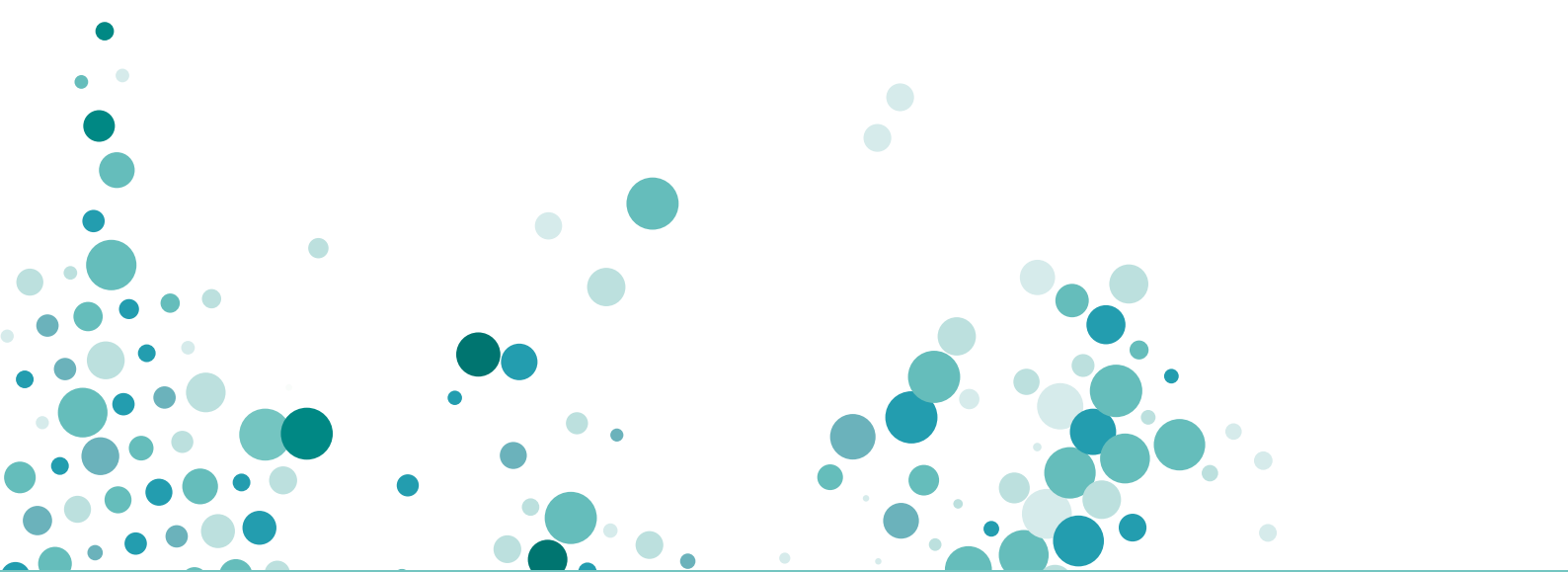
Areas of anti-trafficking activity: prevention of human trafficking, protection of victims, measures related to bringing offenders to justice and collaboration with various actors.

Relates to:

- The recommendation in the National Rapporteur on Trafficking in Human Beings' report for 2014, that the action plan should take account of the child's perspective.
- The Council of Europe's recommendation CP(2015)1, according to which particular attention should be paid in Finland to the child victims of human trafficking, including minors who are not in the custody of a parent or guardian.







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